

December 11, 2009

Professor Larry Goulder  
Chair, Economic and Allocation Advisory Committee  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814



SIERRA NEVADA ALLIANCE

*Keeping light in the range.*

**RE: Climate Adaptation in EAAC Draft Report**

Dear Professor Goulder and Members of the EAAC:

The Sierra Nevada Alliance would like to express our appreciation for the inclusion of climate adaptation in the most recent EAAC draft report (12/9/09). We are now writing to strongly urge the Committee to make adaptation funding a high priority, and to allocate a significant percentage of auction revenue to fund climate adaptation projects.

Since 1993, the Sierra Nevada Alliance has been protecting and restoring Sierra lands, water, wildlife and rural communities. For the past four years, we have worked to educate and motivate Sierra resource managers, decision-makers and local citizens to understand the impacts of climate change as well as the need to reduce our emissions and adapt to the changes we can't prevent.

We are particularly pleased to see the Committee's recommendation that a "significant share" of allowance value should be devoted to investment in emission reduction, adaptation, and environmental remediation. This is especially important to regions like the rural Sierra that currently lack the capacity and resources to comprehensively address emission reduction and adaptation. State support is needed to implement AB32 in the Sierra and to ensure the resiliency of our communities and natural resources to climate change.

Funding for climate change adaptation is necessary to ensure that adequate resources are available to address climate impacts to California, including impacts to the Sierra's vulnerable water, wildlife, habitats, and communities. As the Committee prepares recommendations regarding the amount of allowance value that should be dedicated to certain uses, we encourage you to consider how well climate adaptation measures perform under all three of the Committee's proposed investment criteria:

**Aggregate social net benefits**

Early, strategic investments to address the current and anticipated impacts of global warming can greatly reduce the risks faced by communities and ecosystems, avoiding more costly interventions in the years ahead. In addition, many adaptation measures provide a wide array of environmental, economic, and social equity co-benefits. For example, by undertaking land purchases and management activities to restore and enhance wet mountain meadows, we can enhance local water supply, reduce flood risk, increase carbon sequestration, protect critical

species and habitats, preserve water quality, generate green jobs, and provide new recreational opportunities and open spaces.

### **Fairness**

Investing in climate adaptation also helps advance fairness and equity. First, it reinforces the “polluter pays” principle. Greenhouse gas emitters will be paying to help address the damage that their emissions are causing to communities and the environment. Second, it supports under-resourced and disadvantaged communities. These populations are often targeted for adaptation support because they lack the capacity to protect themselves from adverse climate impacts such as extreme temperatures, increased air pollution, flood risk, and new disease vectors. Third, it reduces interregional inequity. Too often the Sierra provides the resources (water, timber etc.) that help make the state prosperous without state reinvestment in the region. Investing in climate adaptation would ensure the Sierra and other rural regions of the state will be resilient in the face of climate change, and continue to provide important resources to the state’s economy in a sustainable manner.

### **Simplicity**

California already has much of the structure needed to implement adaptation measures quickly, simply, and efficiently. The recently-finalized California Climate Adaptation Strategy identifies and prioritizes adaptation measures to be undertaken by national, state, and local stakeholders. State agencies have already begun to implement many of the identified near-term measures. Local municipalities, NGOs and resources managers in the Sierra are taking action as well. In addition, both the U.S. House and Senate have advanced climate legislation that includes clear, straightforward mechanisms to coordinate adaptation planning and implementation through all levels of government (see H.R. 2454 and S. 1733).

These factors validate the need for robust investment in climate adaptation as part of California’s climate program. We therefore request the committee recommend a significant percentage of auction revenue be dedicated to climate adaptation. We also encourage the committee to strengthen the report’s description of adaptation to highlight the issues raised above and demonstrate California’s pioneering commitment to both reduce emissions *and* adapt to climate change.

Thank you for your consideration,



Joan Clayburgh  
Executive Director



Marion Gee  
Program Associate

CC: Secretary Mike Chrisman, Deputy Secretary Anthony Brunello, Executive Officer Jim Branham